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Attorneys for Defendants

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

AARON SENNE, *et al.*,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF
BASEBALL, *et al.*

Defendants.

Case No. 3:14-cv-00608 JCS (consolidated with
3:14-cv-03289-JCS)

Hon. Joseph C. Spero

CLASS ACTION

**STIPULATION AND [PROPOSED] ORDER
CHANGING TIME PER LOCAL RULE 6-2**

1 Plaintiffs and Defendants, by and through their respective counsel (collectively, the
2 “Parties”), pursuant to Local Rule 6-2, agree as follows:

3 WHEREAS, Plaintiffs filed an Administrative Motion to File Documents Under Seal in
4 Connection with Plaintiffs’ Notice of Motion and Motion for Partial Summary Judgment (*see* Dkt.
5 No. 981) and an Administrative Motion to File Documents Under Seal in Connection with Plaintiffs’
6 *Daubert* Motion to Exclude Certain Expert Testimony Disclosed by Defendants (*see* Dkt. No. 985)
7 on October 29, 2021; and

8 WHEREAS, in accordance with Civil Local Rule 79-5(e)(1), Defendants and the Non-Parties
9 who designated material “Confidential” or “Confidential-Restricted” pursuant to the Parties’
10 Stipulated Protective Order (collectively, the “Designating Parties”) have until November 2, 2021 to
11 file declarations establishing that the designated material is sealable; and

12 WHEREAS, given that over ninety (90) documents were filed under seal and that there are a
13 total of thirty-one (31) Designating Parties, the Parties agree that the Designating Parties shall have
14 until November 9, 2021 to submit declarations in accordance with Civil Local Rule 79-5(e)(1); and

15 WHEREAS, the Court has previously so ordered the Parties’ stipulation for time
16 modifications pursuant to its Orders dated April 10, May 12, May 21, July 11, September 4,
17 September 5, November 10, and December 17, 2014; March 4, October 5, 2015; March 10,
18 September 22, 2016; April 20, 2017; December 18, 2020; February 16, 17, and March 23, 2021,
19 April 15, 2021; May 10, 2021; July 12, 2021 and August 27, 2021 respectively. In particular, the
20 Court has previously so ordered the Parties’ stipulation for time modifications in connection with an
21 Administrative Motion to File Documents Under Seal on March 10, 2016 (*see* Dkt. No. 587),
22 whereby the Court granted an additional nine (9) days for the Designating Parties to file a
23 declaration establishing that all of the designated materials were sealable.

24 WHEREAS, the signature of Plaintiffs’ counsel, Garrett R. Broshuis, shall be sufficient to
25 bind all of the Plaintiffs to the terms of this stipulation and any court order resulting therefrom.

26 NOW, THEREFORE:
27
28

1 IT IS HEREBY STIPULATED AND AGREED, by and between counsel to the Parties in the
2 above-captioned action, that the Designating Parties shall have until November 9, 2021 to submit
3 declarations in accordance with Civil Local Rule 79-5(e)(1).

4
5 DATED: November 1, 2021

Respectfully submitted,

6 /s/ Elise M. Bloom

7 Elise M. Bloom (*pro hac vice*)
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17 /s/ Philippe A. Lebel

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[PROPOSED] ORDER

The Court, having considered the papers and pleadings on file, and cause appearing,
PURSUANT TO STIPULATION:

HEREBY APPROVES the Parties' Stipulation.

IT IS ORDERED that the Designating Parties have until November 9, 2021 to submit
declarations in response to Plaintiffs' Administrative Motions to File Documents Under Seal in
accordance with Civil Local Rule 79-5(e)(1).

DATED:

HON. JOSEPH C. SPERO

FILER'S ATTESTATION

I, Elise M. Bloom, am the ECF user whose identification and password are being used to file this Stipulation and [Proposed] Order Changing Time Per Local Rule 6-2. In compliance with Local Rule 5-1(i)(3), I hereby attest that the counsel listed above concur in this filing. I will maintain an executed copy of this stipulation in our files that can be made available for inspection upon request.

Dated: November 1, 2021

/s/ Elise M. Bloom

Elise M. Bloom